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June 2, 2022

Via ECF

Hon. Ann Marie Donio, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Mitchell H. Cohen U.S. Courthouse, Room 2010  
1 John F. Gerry Plaza  
4th & Cooper Streets  
Camden, New Jersey 08101

Re: Audra Capps, et al. v. Joseph Dixon, et al.  
Case No.: 1:19-cv-12002-RMB-AMD

Tanika Joyce v. Joseph Dixon, et al.  
Case No.: 1:20-cv-01118-RMB-AMD

Dear Judge Donio:

Pursuant to your Honor's May 13, 2022 Order entered in the above matters, and as directed therein, I am providing this status letter on behalf of Defendant Joseph Dixon. Mr. Dixon and I have conferred and are in the process of complying with the provisions and instructions of this Order. However, for the following reasons it is necessary that we respectfully request that the Court grant a 30-day extension of time to complete Dixon's responses to the Court's directives.

In accordance with the Order, Mr. Dixon did forward to me a large volume of electronic data, which I received in my office and began to review on Tuesday, May 31, 2022. I have not had an adequate opportunity to thoroughly review, analyze, and complete the production of any data, as ordered by the Court.

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In addition, with regard to the provision of the Order directing me to order a copy of the transcript of the Court's telephone conference held in these matters on May 12, 2022, and to review that transcript with Defendant Dixon, the transcript has been ordered but has not been received. I did contact the Court Clerk's office on May 17, and confirmed my request that the transcript be provided on an expedited basis, in an email to Ms. Fisher on May 18. Although I was advised that an expedited transcript would take approximately 7 days to complete, it still has not arrived.

For the foregoing reasons, we respectfully request that the Court grant an additional 30 days to complete Defendant Dixon's compliance with the May 13 Order.

Thank you for your Honor's consideration in this regard.

Respectfully submitted,  
**REYNOLDS & HORN, PC**

By: /s/ Thomas B. Reynolds  
Thomas B. Reynolds  
Attorney for Defendant  
Joseph Dixon

Cc: Louis Shapiro, Esquire (Via ECF)  
Michael Barker, Esquire (Via ECF)  
Justin Loughry, Esquire (Via Email)

TBR/e